

**McMANIMON, SCOTLAND
& BAUMANN, LLC**

427 Riverview Plaza

Trenton, New Jersey 08611

(609) 695-6070

Andrea Dobin (adobin@msbnj.com)

Scott D. Platton (splatton@msbnj.com)

Counsel to Andrea Dobin, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

NATIONAL MANAGEMENT &
PRESERVATION SERVICES, LLC, d/b/a
NATIONAL FIELD NETWORK,

Debtor.

Case No. 18-16859 (CMG)

Chapter 7

Honorable Christine M. Gravelle

**Hearing Date and Time:
June 3, 2025 at 10:00 a.m.**

**SUPPLEMENTAL CERTIFICATION OF ANDREA DOBIN IN
SUPPORT OF HER MOTION FOR AN ORDER AUTHORIZING
THE DESTRUCTION OF RECORDS**

ANDREA DOBIN, of full age, by way of certification states as follows:

1. I am an attorney at law of the State of New Jersey and serve as the Chapter 7 Trustee in the bankruptcy proceeding of National Management & Preservation Services, LLC, d/b/a National Field Network (the “**Debtor**”). I submit this Supplemental Certification in support of my Motion for an Order authorizing the destruction of records and, except where as noted, I have personal knowledge of the facts set forth herein.
2. On May 14, 2025, my counsel filed a Motion for an Order authorizing the destruction of certain physical records of Debtor’s currently located in my counsel’s Roseland, New Jersey office as well as those in the possession of my accountant. [ECF 369].

3. The records in Roseland were acquired from Victor Deutch (“**Mr. Deutch**”) in his capacity as counsel for Debtor and were obtained during Adv. Pro. No. 20-1647. [ECF 369-1, ¶7.]

4. On May 27, 2025, Mr. Deutch contacted my office by telephone with an offer to reclaim the records that came from his office.

5. Considering Mr. Deutch’s willingness to retake possession of the records and I having no objection to such turnover (which is consistent with the New Jersey Rules of Professional Conduct), I am submitting a revised proposed Order authorizing the destruction of the records if Mr. Deutch does not reclaim them from my counsel’s Roseland, New Jersey office within thirty (30) days.

6. This revised proposed Order supersedes the May 14, 2025, proposed Order.

I certify under penalty of perjury that the foregoing is true and correct.

By: /s/ Andrea Dobin
ANDREA DOBIN

Dated: May 27, 2025